

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**WELLS FARGO BANK, N.A., SUCCESSOR BY
MERGER TO WELLS FARGO BANK
MINNESOTA, N.A., AS TRUSTEE F/K/A
NORTHWEST BANK MINNESOTA, N.A., AS
TRUSTEE FOR DELTA FUNDING HOME
EQUITY LOAN TRUST 2001-1**

CASE NUMBER: 1:12-cv-1521

PLAINTIFF

VS.

**John Kent, Earl Kent, Mary Lee Green, Susie
Ann Bailey, Gloria Jean Pruitt, Mattie Anderson,**

DEFENDANTS.

ANSWER TO AMENDED COMPLAINT

Now Come **JOHN KENT, LEE EARL KENT, MARY LEE GREEN, SUSIE ANN BAILEY, GLORIA JEAN PRUITT, and MATTIE ANDERSON**, Defendants, by and through their attorney Anthony M. Vaccarello, and for their Answer to Plaintiff's Amended Complaint, state as follows:

1. Defendants admit the allegations in paragraph 1.
2. Defendants admit the allegations in paragraph 2.
3. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 3.
4. Defendants admit the allegations in paragraph 4.
5. Defendants admit the allegations in paragraph 5.
6. Defendants deny that Plaintiff may elect to accelerate the principal balance due by the filing of a complaint.
7. Defendants deny the allegations in paragraph 7, and state further that the "pre-suit notices" referred to in paragraph 7 are not attached as exhibits to Plaintiff's Complaint.

8. Defendants admit the allegations in paragraph 8.
9. Paragraph 9 contains informational allegations regarding the mortgage:
 - (a) - (i) Defendants admit subparagraphs (a) - (i).
 - (j) Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in subparagraph 9(j).
 - (k) - (p) Defendants admit subparagraphs (k) - (P).
 - (q) Defendants deny the allegations of subparagraph (q) and state further that two of the defendants, John Kent and Mattie Anderson, occupy the property as their primary residences.
 - (r) - (s) Defendants admit subparagraphs (r) and (s).

WHEREFORE Defendants respectfully request that Plaintiff's Amended Complaint be dismissed.

Respectfully Submitted,

/s/ Anthony M. Vaccarello
Attorney for Defendants

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